

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

Mark T. Cox & Riddick S. Richardson,	)	Civil Action No. 4:12-cv-03333-JFA
	)	
Plaintiffs,	)	
vs.	)	
	)	
Time Warner Cable Inc.,	)	
	)	
<u>Defendant.</u>	)	
<hr/>		
Fred W. Elmore,	)	Civil Action No. 4:13-cv-03407-JFA
	)	
Plaintiff,	)	
vs.	)	
	)	
Time Warner Cable Inc.,	)	<b>MOTION FOR ENTRY OF</b>
	)	<b>CONFIDENTIALITY ORDER</b>
<u>Defendant.</u>	)	

The attached proposed Confidentiality Order is requested by consent of all parties.

The attached proposed Confidentiality Order is a modified version of the standard form on the court's website and the modifications have been indicated by attaching a "redlined" copy the document. An explanation of the basis for each proposed modification is as follows:

The form agreement has been modified (i) to remove the Reading Room provision, and (ii) to delete the requirement of documenting disclosure to employees of counsel's law firm whose assistance is reasonably necessary to the conduct of this litigation.

**WE SO MOVE**

s/Frank R. Ellerbe, III

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**WE CONSENT**

s/Francis M. Hinson, IV

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May 24, 2013

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May 24, 2013